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*Attorneys for Plaintiff  
Maclarens Europe Limited*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
MACLAREN EUROPE LIMITED, :  
: Plaintiff, : NOTICE OF MOTION  
: :  
-against- : :  
: : INDEX No. 11 cv 4688 (HB)  
ACE AMERICAN INSURANCE COMPANY, :  
a/k/a ACE USA, :  
: Defendant. :  
-----X

To: Sedgwick LLP  
125 Broad Street, 39<sup>th</sup> Fl.  
New York, New York 10004  
*Attorneys for Defendant*

Plaintiff Maclarens Europe Limited, by and through its attorneys, Clayman & Rosenberg LLP., upon the Declaration of Paul Hugel dated June 13, 2012, the exhibits thereto, the accompanying Memorandum of Law and all of the prior pleadings and proceedings in this action, hereby requests that the Court enter an order pursuant to Federal Rule of Civil Procedure 56 granting summary judgment in favor of Plaintiff and declaring that the policy of insurance issued by defendant ACE American Insurance Company to Plaintiff effective April 10, 2006, remained in full force and effect through April 10, 2007.

Dated: New York, New York  
June 13, 2012

CLAYMAN & ROSENBERG LLP  
ATTORNEYS FOR PLAINTIFF

By: \_\_\_\_\_/s  
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